

REMARKS

Claims 1-24 are currently pending. Applicants respectfully request reconsideration thereof. A minor grammatical improvement has been made to claims 1 and 21 without affecting the scope of the claims.

The Office Action includes a statement that the claim for foreign priority has been made. It is assumed that the Examiner has determined that the certified Korean Language priority document sufficiently supports the claims of the present application and therefore has determined the effective filing date of the present application as 14 March 2000.

The Office Action includes a rejection of claims 1-3, 6-13 and 16-24 under 35 U.S.C. §102(e) as allegedly being anticipated by the Suzuki patent (U.S. Patent No. 6,611,262). This rejection is respectfully traversed.

The Office Action suggests that the entirety of claims 1 and 21 is met by a single passage of the Suzuki patent found at column 11, lines 7-15. This passage states:

When a user inputs from an external terminal (not shown), a request signal for causing a certain AV object to be displayed, a request signal REQ is supplied to the scene control circuit 301. Upon reception of the request signal REQ, the scene control circuit 301 determines what AV object should be transmitted by referring to the scene description SD that is stored in the storage device 302 based on the request signal REQ, and outputs a scene request signal SREQ to the storage device 302.

What is not disclosed or suggested by this passage of the Suzuki patent, with reference to claim 1, is, *inter alia*, setting downstream/upstream channels between the server and the terminal as *initialization*; the terminal forming an upstream

channel message if a user requests a predetermined processing of a predetermined object occurs in a scene transmitted from the server to the terminal through the downstream channel, and transmitting the message to the server through the upstream channel or the terminal substituting the processing result of step (c) for the predetermined object in the scene transmitted in step (b) and providing it to the user. The only thing this passage could arguably meet is step (c) of claim 1. It does not speak to initialization or the setting of downstream/upstream channels or the idea of substituting the processing result of one step (server receiving the upstream channel message, interpreting the message, processing the message as the user request of predetermined processing, and transmitting the result to the terminal) or the predetermined object as seen transmitted in step (b), which involves the terminal forming an upstream channel message if a user requests if a predetermined object occurs in a scene transmitted from the server to the terminal through the downstream channel, in transmitting the message to the server through the upstream channel), and providing it to the user.

It is assumed that the Office was suggesting that these steps were inherent to the passage at column 11, lines 7-15. However, there are many ways to implement such a system as described in this passage of the Suzuki patent, and the passage actually only addresses the results of step (c) of claim 1. There is no reason to believe that one of ordinary skill in the art would understand this passage to mean, or think it obvious to implement, a user request processing method using an upstream channel after a three-dimensional scene, generated based on a binary format, is

transmitted from a server to a terminal in the manner recited in applicants' claims 1 and 21.

With respect to independent claim 11, it is noted that the recitations actually include "a terminal for forming an upstream channel message if a user requests a predetermined processing for a predetermined object in the scene transmitted from the server occurs, and transmitting the message to the server through an upstream channel." Applicants have reviewed the passage at column 11, lines 7-15, of the Suzuki patent and have not determined any support for the recitations listed above, particularly with respect to an upstream channel. With respect to independent claim 23, it is noted that this claim parallels claim 11 in an apparatus claim format. Accordingly, it is patentable for the same reasons independent claim 11 is patentable.

The Office Action also includes a rejection of dependent claims 2, 3, 6-10, 12, 13, 16-20 and 22-24. Each of these dependent claims adds features that further separate the present invention from the applied art, and are also patentable for at least the same reasons that the independent claims are patentable, as separately discussed above. Discussion of the dependent claims will not be belabored for sake of brevity. It is noted, for instance, however, that the passages cited in the Office Action do not seem to meet the recitations of the dependent claims. For instance, claim 2 recites four discrete steps, including forming an upstream channel message containing the note identifier in the command. Applicants did not see support for the assertion that these recitations, taken in combination, are anticipated.

The Office Action also includes a rejection of claims 4, 5, 14 and 15 under 35 U.S.C. §103 as allegedly being unpatentable over the Suzuki patent in view of the Tenev et al patent (U.S. Patent No. 6,654,761). It is noted that these dependent claims are patentable for at least the same reasons that the claims from which they depend are patentable. The Tenev et al patent is merely cited for teaching the concept of reusable nodes. Even if this assertion could be fully supported, it would not cure the deficiencies noted with respect to the rejection of the independent claims, as discussed above.

In light of the foregoing, applicants respectfully request reconsideration and allowance of the above-captioned application. Should any residual issues exist, the Examiner is invited to contact the undersigned at the number listed below.

Respectfully submitted,

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